

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	:	ECF Case
JIMMY LYONS, <i>et al.</i> , individually and	:	
on behalf of all others similarly situated,	:	No. 13 Civ. 513 (ALC) (HBP)
	:	
Plaintiffs,	:	NOTICE OF MOTION
	:	
vs.	:	
	:	
LITTON LOAN SERVICING LP, <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, as well as supporting materials previously filed in connection with prior motions, defendants Litton Loan Servicing, LP, The Goldman Sachs Group, Inc., Arrow Corporate Member Holdings, LLC, Saxon Mortgage Services, Inc., Morgan Stanley, Assurant, Inc., American Security Insurance Company, and Standard Guaranty Insurance Company, by and through undersigned counsel, will move in the above-captioned action before the Honorable Andrew L. Carter, Jr., United States District Judge, on a date and at a time to be determined by the Court, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for the entry of an order dismissing, with prejudice, the claims of Frances and Johnnie Erving and Shelia Heard, and granting such other and further relief as may be just and equitable.

Dated: November 20, 2015

Respectfully submitted,

STROOCK & STROOCK & LAVAN LLP

CARLTON FIELDS JORDEN BURT, P.A.

By: /s/ Melvin A Brosterman

Melvin A. Brosterman
mbrosterman@stroock.com
Quinlan D. Murphy
qmurphy@stroock.com
Patrick N. Petrocelli
ppetrocelli@stroock.com
180 Maiden Lane
New York, NY 10038-4982
Telephone: (212) 806-5400
Facsimile: (212) 806-6006

By: /s/ Frank G. Burt

Frank G. Burt (*pro hac vice*)
fburt@cfjblaw.com
W. Glenn Merten (*pro hac vice*)
gmerten@cfjblaw.com
Brian P. Perryman (*pro hac vice*)
bperryman@cfjblaw.com
1025 Thomas Jefferson Street NW
Suite 400 East
Washington, DC 20007
Telephone: (202) 965-8100
Facsimile: (202) 965-8104

-and-

Benjamin G. Diehl
bdiehl@stroock.com
Wesley M. Griffith
wgriffith@stroock.com
2029 Century Park East, Suite 1600
Los Angeles, California 90067-3086
Telephone: (310) 556-5800
Facsimile: (310) 556-5959

SULLIVAN & WORCESTER LLP

Andrew T. Solomon
asolomon@sandw.com
1633 Broadway
32nd Floor
New York, New York 10019
Telephone: (212) 660-3000
Facsimile: (212) 660-3001

*Attorneys for Defendants The Goldman Sachs
Group, Inc. and Arrow Corporate Member
Holdings LLC*

*Attorneys for Defendants Assurant, Inc.,
American Security Insurance Company, and
Standard Guaranty Insurance Company*

HUNTON & WILLIAMS LLP

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Ryan A. Becker

Brian V. Otero
botero@hunton.com
Stephen R. Blacklocks
sblacklocks@hunton.com
Ryan A. Becker
rbecker@hunton.com
200 Park Avenue, 52nd Floor
New York, New York 10166
Telephone: (212) 309-1000
Facsimile: (212) 309-1100

By: /s/ Mary Gail Gearn

Mary Gail Gearn
marygail.gearn@morganlewis.com
Matthew Minerva
matthew.minerva@morganlewis.com
101 Park Avenue
New York, New York 10178
Tel: (212) 309-6000
Fax: (212) 309-6001

*Attorneys for Defendant Litton
Loan Servicing LP*

*Attorneys for Defendants Saxon Mortgage Services,
Inc. and Morgan Stanley*